

John P. Sheridan  
Mazzola Mardon, P.C.  
26 Broadway, 17<sup>th</sup> Floor  
New York, NY 10004  
Telephone: (212) 425-3240  
Facsimile: (212) 943-6649  
jsheridan@mmpc.com

*Attorneys for Defendants International  
Longshoremen's Association; ILA Local 1804-1;  
ILA Local 1233; and ILA Local 1235*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

-----X  
INTERNATIONAL UNION OF OPERATING :  
ENGINEERS, LOCAL 825, :  
: Plaintiff, :  
: :  
v. : Civil Action No.  
: 2:23-cv-03689  
INTERNATIONAL LONGSHOREMEN'S :  
ASSOCIATION, INTERNATIONAL :  
LONGSHOREMEN'S ASSOCIATION LOCAL 1233, :  
INTERNATIONAL LONGSHOREMEN'S :  
ASSOCIATION 1235, and INTERNATIONAL :  
LONGSHOREMEN'S ASSOCIATION LOCAL 1804-1, :  
: Defendants. :  
-----X

**APPLICATION FOR EXTENSION OF TIME TO  
ANSWER, MOVE, OR OTHERWISE REPLY  
[Local Civil Rule 6.1(b)]**

Defendants International Longshoremen's Association ("ILA"), ILA Local 1804-1, ILA Local 1233 and ILA Local 1235 ("Defendants"), through their undersigned counsel, hereby apply pursuant to Rule 6(b)(1)(A) of the Federal Rules of Civil Procedure and Local Rule 6.1(b), for an order extending the time to answer, move, or otherwise reply to Plaintiff's Amended Complaint.

In support of this Motion, Defendants state as follows:

1. On July 19, 2023, Plaintiff filed its Amended Complaint in the above-captioned matter.
2. On July 26, 2023, Defendants ILA Local 1233 and ILA Local 1235 were served with process, thereby requiring an answer or response to the Amended Complaint by August 16, 2023.
3. On August 8, 2023, Defendants ILA and ILA Local 1804-1 were served with process, thereby requiring an answer or response to the Amended Complaint by August 29, 2023.
4. No prior extensions of time have been requested.
5. Defendants now seek an extension of time, pursuant to Local Rule 6.1(b), until August 30, 2023, for all Defendants to answer, move, or otherwise reply.

**WHEREFORE**, all Defendants respectfully apply pursuant to Local Rule 6.1(b), for an order extending the time to answer, move, or otherwise reply to Plaintiff's Amended Complaint until August 30, 2023.

Dated: New York, New York  
August 11, 2023

MAZZOLA MARDON, P.C.

/s/John P. Sheridan

John P. Sheridan  
26 Broadway, 17<sup>th</sup> Floor  
New York, NY 10004  
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Facsimile: (212) 943-6649  
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**CERTIFICATE OF SERVICE**

I hereby certify that on this 11th day of August, 2023, a copy of the foregoing document was filed electronically with the Clerk of Court using the CM/ECF system. Notice of this filing will be sent to all counsel of record, by operation of the court's electronic filing system.

/s/John P. Sheridan  
John P. Sheridan

**ORDER**

The above application is **ORDERED GRANTED** extended to August 30, 2023.

**ORDER DATED:** \_\_\_\_\_

CLERK OF COURT

By: \_\_\_\_\_  
Deputy Clerk